

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

RHODE ISLAND COALITION AGAINST
DOMESTIC VIOLENCE, *et al.*

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official
capacity as Secretary of the United States
Department of Health and Human Services, *et al.*

Defendants.

Case No. 1:25-cv-00342

**PLAINTIFFS' FOURTH MOTION TO AMEND
THE TEMPORARY RESTRAINING ORDER**

Plaintiffs move to expand the Court's July 28, 2025, Temporary Restraining Order (TRO) (ECF 23), as amended on August 7, 2025 (ECF 37), to include Kansas Coalition Against Sexual and Domestic Violence and its members and Colorado Coalition Against Sexual Assault's members. In support of this motion, Plaintiffs submit the supplemental declarations of Michelle McCormick and Brielyn Akins. Expansion of the TRO is warranted for the same reasons the initial TRO was warranted, as explained in Plaintiffs' memorandum of law (ECF 13-1).

In early August, after the Court entered its TRO, Plaintiff Kansas Coalition Against Sexual and Domestic Violence received a grant agreement for a Continuum of Care Grant that includes the HUD funding conditions covered by the TRO. Supplemental Declaration of Michelle McCormick ¶ 12. HUD requested that the Kansas Coalition sign "by September" because "HUD is pushing to contract these funds as soon as possible." *Id.* In addition, on August 15, Plaintiff Colorado Coalition Against Sexual Assault's Member Doe 1 received a grant

agreement for a Continuum of Care Grant that receives the HUD funding conditions covered by the TRO. Supplemental Declaration of Brielyn Akins ¶ 11. Because the performance period for the award has already begun, Member Doe 1 needs to draw down as soon as possible for cashflow reasons. *Id.*

Given these developments, Plaintiffs ask that the Court expand the TRO to cover Kansas Coalition Against Sexual and Domestic Violence and its members' HUD grants and the Colorado Coalition Against Sexual Assault's members' HUD grants. Defendants oppose this request. *See* Defendants' Ongoing Objection (ECF 40).

August 18, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2025, I electronically filed the within motion and it is available for viewing and downloading from the Court's CM/ECF System, and that the participants in the case that are registered CM/ECF users will be served electronically by the CM/ECF system.

/s/ Nina C. Cahill